

## Indiana Department of Environmental Management

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan Governor

Lori F. Kaplan Commissioner

September 22, 2003

100 North Senate Avenue P.O. Box 6015 Indianapolis, Indiana 46206-6015 (317) 232-8603 (800) 451-6027 www.in.gov/idem

TO: Interested Parties / Applicant

RE: Eaton Corporation / SPR 141-17787-00057

Paul Dubenetzky FROM:

Chief, Permits Branch Office of Air Quality

## **Notice of Decision: Approval - Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication. 100 North Senate Avenue. Government Center North, Room 1049, Indianapolis, IN 46204, within eighteen (18) calendar days of the mailing of this notice. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- the date the document is delivered to the Office of Environmental Adjudication (OEA); (1)
- the date of the postmark on the envelope containing the document, if the document is mailed to (2)OEA by U.S. mail; or
- The date on which the document is deposited with a private carrier, as shown by receipt issued by (3) the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3)identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- the issues, with particularity, proposed for considerations at any hearing; and (5)
- identification of the terms and conditions which, in the judgment of the person making the request, (6) would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

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**Enclosures** FNPER.dot 9/16/03





# Indiana Department of Environmental Management

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Commissioner

100 North Senate Avenue P. O. Box 6015 Indianapolis, Indiana 46206-6015 (317) 232-8603 (800) 451-6027 www.IN.gov/idem

September 22, 2003

Mr. John O'Neill Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant 2930 Foundation Drive South Bend, IN 46628

Re: **141-17787** 

First Significant Revision to **FESOP 141-13952-00057** 

Dear Mr. O'Neill:

Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant was issued a permit on February 19, 2002 for a metal product forging and fabricating source. A letter requesting changes to this permit was received on May 28, 2003. Pursuant to the provisions of 326 IAC 2-8-11.1 a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document.

The revision consists of the construction and operation of one (1) table blast system and one (1) through blast system with baghouses as controls at the existing source. Also, the source name has been corrected on the permit.

The following construction conditions are applicable to the proposed project:

#### 1. General Construction Conditions

The data and information supplied with the application shall be considered part of this source modification approval. Prior to <u>any</u> proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

- This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- 3. <u>Effective Date of the Permit</u>

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

- 4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
- 5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant Page 2 of 2

South Bend, Indiana FESOP No.: 141-13952-00057
Permit Reviewer: CAP/MES Significant Permit Revision No.: 141-17787-00057

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised FESOP, with all revisions and amendments made to it, is being provided.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact CarrieAnn Paukowits, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permits Branch Office of Air Quality

Attachments CAP/MES

cc: File - St. Joseph County

U.S. EPA, Region V

St. Joseph County Health Department

Northern Regional Office

Air Compliance Section Inspector - Rick Reynolds

Compliance Branch - Karen Nowak Administrative and Development

Technical Support and Modeling - Michele Boner



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100 North Senate Avenue P. O. Box 6015 Indianapolis, Indiana 46206-6015 (317) 232-8603 (800) 451-6027 www.IN.gov/idem

# FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

# Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant 2930 Foundation Drive South Bend, Indiana 46628

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 141-13952-00057	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 19, 2002 Expiration Date: February 19, 2007

First Administrative Amendment No. 141-17369-00057, issued on June 19, 2003

Significant Permit Revision No.: F 141-17787-00057	Conditions Affected: A.2, facility description box in D.1, D.1.1, D.1.2, D.1.5, D.1.6, D.1.7, D.1.8, D.1.9, D.1.10 and D.1.11, and source name corrected on each page and on forms
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:September 22, 2003

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Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant First Significant Permit Revision 141-17787 South Bend, Indiana

Permit Reviewer: CAP/MES Revised by: MES

#### **SECTION A**

#### SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

#### General Information [326 IAC 2-8-3(b)] A.1

The Permittee owns and operates a stationary metal product forging and fabricating source.

Authorized Individual: James Seaver

Source Address: 2930 Foundation Drive, South Bend, Indiana 46628 Mailing Address: 2930 Foundation Drive, South Bend, Indiana 46628

General Source Phone Number: (219) 283-5006

SIC Code: 3462 County Location: St. Joseph

Source Location Status: Attainment for all criteria pollutants

Source Status: Federally Enforceable State Operating Permit (FESOP)

Minor Source, under PSD Rules;

Minor Source, Section 112 of the Clean Air Act

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#### Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)] A.2

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) shot blast machine, identified as EU-8, constructed in 1980, equipped with a baghouse and exhausting through stack SV-4, capacity: 28 cubic feet, with a maximum process weight rate of 3.324 tons per hour.
- (b) One (1) shot blast machine, identified as EU-9, constructed in 1997, equipped with a baghouse and exhausting through stack SV-5, capacity: 34 cubic feet, with a maximum process weight rate of 3.324 tons per hour.
- (c) Six (6) forge press cells, identified as EU-1 through EU-6, controlled by five (5) hydrostatic precipitators (rotoclones), each cell is equipped with one (1) load tub lift and bowl loader, with a total of two (2) meter boxes, and twenty-one (21) induction coils, with three (3) forge press cells (EU-1 through EU-3) exhausting to stack SV-1 and three (3) forge press cells (EU-4 through EU-6) exhausting to stack SV-2, maximum capacity: 4.05 tons of steel billets per hour, total.
- (d) One (1) forge press cell, identified as EU-13, constructed in 1998, controlled by a hydrostatic precipitator (rotoclone), equipped with one (1) load tub lift, one (1) meter box, one (1) bowl loader, and four (4) induction coils, exhausting to stack SV-9, maximum capacity: 1.04 tons of steel billets per hour.
- One (1) 3,000-ton forge press cell (Serial No. 21601), identified as EU-14, constructed in (e) 1999, controlled by a hydrostatic precipitator (rotoclone) and including five (5) induction coils with a maximum temperature up to 2,250EF, two (2) inverters, one (1) billet load system, one (1) transform conveyor and one (1) cool down conveyor, exhausting through stack SV-9, maximum capacity: 1.04 tons of steel billets per hour.

Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant
South Bend, Indiana First Significant Permit Revision 141-17787
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(f) One (1) table blast system, identified as EU-19, equipped with a baghouse and exhausting through stack SV-14, maximum process weight rate: 2,000 pounds per hour.

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(g) One (1) through blast system, identified as EU-20, equipped with a baghouse and exhausting through stack SV-15, maximum process weight rate: 6,650 pounds per hour.

#### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour (total capacity is approximately 28.0 million British thermal units per hour). There are no boilers at this source.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including two (2) maintenance parts washers with capacities less than 80 gallons each and using only non-halogenated solvents. [326 IAC 8-3]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1]
- (d) Natural draft cooling towers not regulated under a NESHAP.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Paved roads and parking lots with public access.
- (g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. Specifically including the following equipment, with dry processes exhausting to bag/barrel filters and wet processes having self-contained coolant reservoirs, with equipment in the die set up area exhausting to stack SV-7 and equipment in the tool room exhausting to stack SV-8: [326 IAC 6-1]
  - (1) Engin 20 X 54 lathe
  - (2) Engin 16 X 102 lathe
  - (3) Two (2) 12" wheel grinders
  - (4) Jet abrasive cut off saw
  - (5) Vertical band saw
  - (6) Norton surface grinder
  - (7) Vertical belt polisher
  - (8) Two (2) Taft Peirce surface grinders
  - (9) Cincinnati tool grinder
  - (10) ID/OD grinder
  - (11) Making tool grinder
  - (12) US Electric double end grinder

Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant First Significant Permit Revision 141-17787 OP No. F 141-13952-00057 South Bend, Indiana Permit Reviewer: CAP/MES Revised by: MES

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- (13)Two (2) double end tool grinders
- (14)Powermatic belt/disc grinder
- (15)Abrasive wheel cut off saw
- (16)10" double end tool grinder
- (17)4 Ft. radial drill press
- (18)Engin 10 X 30 Lathe
- (19)Bridgeport mill vertical 9 X 42 mill
- (20)Engin lathe
- (21)Enterprise horizontal mill
- (22)Giddings 10TF CNC lathe
- (23)Giddings 15TF CNC
- (24)Marvel horizontal saw
- (25)Madison grinder
- (26)OKK mill
- Bridgeport vertical mill (27)
- (28)Four (4) drill presses
- (29)Arbor press
- (30)Johansson drill press
- (31)Clausing 15" lathe
- (32)Clausing band saw
- (33)Kondia power mill
- (34)Monarch 18" CNC lathe
- (35)Cinn 273A grinder
- Heem 18" vertical saw (36)
- (37)Dewalt 12" radial saw
- (38)Wadtkin 12" table saw
- (39)Empire sand blast cabinet
- (40)3012U band saw
- (41) 16" Boring mill
- (42)Mazak CNC milling machine
- (43)Okuma CNC Lathe LB35II
- (44)Okuma CNC Lath L1420
- (45)Mitsubishi DWC90HA wire EDM
- (46)Dake movable bed arbor machine
- Welders for maintenance have manganese compounds in rod. Small amount of spray (h) cans are used to mark containers for maintenance (Rustoleum) which contains toluene and xylene. [326 IAC 6-1]
- (i) Oil recovery system.
- Two (2) electric Tool room heat treat cabinets (j)
- (k) Water evaporator

- (I) One (1) plastic blast system, identified as EU-10, constructed in 1994, controlled by a baghouse and Hepa filter, and exhausting to stack SV-6. [326 IAC 6-1], and
- (m) Three (3) Nishijimax NHC100 CNC billet cutoff saws.

#### A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

#### A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

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#### **SECTION B**

#### **GENERAL CONDITIONS**

#### B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

#### B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

#### B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

#### B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

#### B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

#### B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

#### B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

# B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ,

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copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-8-4(5)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

#### B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

#### B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

#### B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

#### B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

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- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

#### B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices:
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

#### B.14 Emergency Provisions [326 IAC 2-8-12]

An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

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- An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an (b) action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit:
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ / Northern Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered:

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section),

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

Regional Office Telephone No.: 574-245-4870 Regional Office Facsimile No.: 574-245-4877

Failure to notify IDEM, OAQ / Northern Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis. Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

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(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

#### B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

# B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

#### B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (1) A timely renewal application is one that is:

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- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9] If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

#### B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

#### B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

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Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
  The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]

  The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

#### B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

### B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

#### B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

#### B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

#### **SECTION C**

#### **SOURCE OPERATION CONDITIONS**

#### **Entire Source**

#### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8][326 IAC 2-2]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

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- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Any change or modification that increases the potential to emit PM to 250 tons per year or more shall cause this source to become a major source pursuant to 326 IAC 2-2, PSD, and shall require prior OAQ approval.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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#### C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

#### C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

#### C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

#### C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

#### C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Asbestos Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

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The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
  The Permittee shall comply with the applicable emission control procedures in 326 IAC 1410-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are
  applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes
  or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet
  on all facility components.
- (f) Indiana Accredited Asbestos Inspector
  The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior
  to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly
  inspect the affected portion of the facility for the presence of asbestos. The requirement that
  the inspector be accredited is federally enforceable.

#### Testing Requirements [326 IAC 2-8-4(3)]

#### C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### Compliance Requirements [326 IAC 2-1.1-11]

#### C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

#### C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

#### C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

# C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

#### Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

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- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

#### C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- C.17 Compliance Response Plan Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]
  - (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
    - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

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(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

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- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

#### C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

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- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

#### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

#### C.19 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The emission statement required by this permit shall be considered timely if the date post-marked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

#### C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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#### C.21 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- Unless otherwise specified in this permit, any notice, report, or other submission required by (c) this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- Reporting periods are based on calendar years. (e)

#### **Stratospheric Ozone Protection**

#### Compliance with 40 CFR 82 and 326 IAC 22-1 C.22

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- Persons opening appliances for maintenance, service, repair or disposal must comply with (a) the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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#### **SECTION D.1**

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) shot blast machine, identified as EU-8, constructed in 1980, equipped with a baghouse and exhausting through stack SV-4, capacity: 28 cubic feet, with a maximum process weight rate of 3.324 tons per hour.
- (b) One (1) shot blast machine, identified as EU-9, constructed in 1997, equipped with a baghouse and exhausting through stack SV-5, capacity: 34 cubic feet, with a maximum process weight rate of 3.324 tons per hour.
- (f) One (1) table blast system, identified as EU-19, equipped with a baghouse and exhausting through stack SV-14, maximum process weight rate: 2,000 pounds per hour.
- (g) One (1) through blast system, identified as EU-20, equipped with a baghouse and exhausting through stack SV-15, maximum process weight rate: 6,650 pounds per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

- (a) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from each of the two (2) shot blast machines (EU-8 and EU-9) shall be limited to 0.03 grain per dry standard cubic foot, equivalent to 0.996 pounds per hour from the one (1) shot blast machine identified as EU-8, when operating at a flow rate of 3,907 actual cubic feet per minute, and 1.53 pounds per hour from the one (1) shot blast machine identified as EU-9, when operating at a flow rate of 6,136 actual cubic feet per minute.
- (b) Pursuant to 326 IAC 6-1-2(a) (County Specific Particulate Matter Limitations), particulate matter (PM) emissions from the one (1) table blast system (EU-19) shall be limited to seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)), equivalent to 0.566 pounds per hour when operating at a flow rate of 2,200 dry standard cubic feet per minute.
- (c) Pursuant to 326 IAC 6-1-2(a) (County Specific Particulate Matter Limitations), particulate matter (PM) emissions from the one (1) through blast system (EU-20) shall be limited to seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)), equivalent to 1.29 pounds per hour when operating at a flow rate of 5,000 dry standard cubic feet per minute.

#### D.1.2 Particulate Matter (PM and PM<sub>10</sub>) [326 IAC 2-8-4] [326 IAC 2-2] [40 CFR 52.21]

(a) Pursuant to FESOP 141-5555-00057, issued on December 11, 1996, and in order to comply with 326 IAC 2-8, FESOP, the PM<sub>10</sub> emissions from the total of the four (4) shot blasting machines (EU-8, EU-9, EU-19 and EU-20) shall not exceed 21.89 pounds per hour. This will result in PM<sub>10</sub> emissions of less than 95.9 tons per year from the four (4) shot blasting machines. Together with Condition D.2.2(a), this condition shall limit the potential to emit PM<sub>10</sub> to less than one hundred (100) tons per year from the total of all facilities at this source. Therefore, the requirements of 326 IAC 2-7 do not apply.

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(b) The potential to emit PM from the total of the four (4) shot blasting machines (EU-8, EU-9, EU-19 and EU-20) shall not exceed 43.8 pounds per hour. This will result in PM emissions of less than 192 tons per year from the total of the four (4) shot blasting units. Together with Condition D.2.2(b), this condition shall limit the potential to emit PM to less than 250 tons per year from the total of all facilities at this source. Therefore, the requirements of 326 IAC 2-2, PSD, do not apply.

#### D.1.3 Nonapplicable Condition

Condition D.1.2 from FESOP 141-5555-00057, issued on December 11, 1996, which states that the  $PM_{10}$  emissions from the entire source shall not exceed 8.25 tons per month; Therefore, the requirements of 326 IAC 2-7 do not apply, is not applicable because the  $PM_{10}$  hourly limits in Condition D.1.2 of this permit will be sufficient to show that the requirements of 326 IAC 2-7 do not apply. Therefore, Condition D.1.2 from FESOP 141-5555-00057, is hereby rescinded.

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

#### **Compliance Determination Requirements**

#### D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

- (a) During the period between July 29, 2002 and January 25, 2003, in order to demonstrate compliance with Conditions D.1.1 and D.1.2 the Permittee shall perform PM and PM<sub>10</sub> testing of the two (2) shot blast machines (EU-8 and EU-9) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM<sub>10</sub> includes filterable and condensible PM<sub>10</sub>. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) Within two hundred and seventy (270) days after initial startup, in order to demonstrate compliance with Conditions D.1.1(b), D.1.1(c), and D.1.2, the Permittee shall perform PM and PM<sub>10</sub> testing for the one (1) table blast system (EU-19) and the one (1) through blast system (EU-20) utilizing methods as approved by the Commissioner. PM<sub>10</sub> includes filterable and condensible PM<sub>10</sub>. Testing shall be conducted in accordance with Section C- Performance Testing.

#### D.1.6 Particulate Matter (PM and PM<sub>10</sub>)

- (a) Pursuant to FESOP 141-5555-00057, issued on December 11, 1996, and in order to comply with Conditions D.1.1 and D.1.2, the baghouse for PM and PM<sub>10</sub> control shall be in operation at all times when the shot blast machine (EU-8) is in operation.
- (b) Pursuant to FESOP 141-5555-00057, issued on December 11, 1996, and in order to comply with Conditions D.1.1 and D.1.2, the baghouse for PM and PM<sub>10</sub> control shall be in operation at all times when the shot blast machine (EU-9) is in operation.
- (c) In order to comply with Conditions D.1.1(a) and D.1.2, the baghouse for particulate control shall be in operation at all times when the one (1) table blast system (EU-19) is in operation.
- (d) In order to comply with Conditions D.1.1(b) and D.1.2, the baghouse for particulate control shall be in operation at all times when the one (1) through blast system (EU-20) is in operation.

#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.1.7 Visible Emissions Notations

(a) Visible emission notations of the shot blasting (EU-8, EU-9, EU-19 and EU-20) stack exhausts (SV-4, SV-5, SV-14 and SV-15) shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C Compliance Response Plan Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

#### D.1.8 Parametric Monitoring

- (a) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the two (2) shot blast machines (EU-8 and EU-9), at least once per shift when the shot blast machines are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan-Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C Compliance Response Plan Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the one (1) table blast system (EU-19) and the one (1) through blast system (EU-20), at least once per shift when the blasting is in operation when venting to the atmosphere. When or any one reading, the pressure drop across the baghouse is outside the normal range of 0.50 and 1.00 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan -Failure to Take Response. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instruments used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.1.9 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the shot blast machines (EU-8, EU-9, EU-19 and EU-20) when venting to the atmosphere. A baghouse inspection shall be

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performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

#### D.1.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C Compliance Response Plan Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B Emergency Provisions).

#### Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.1.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the shot blast machines (EU-8, EU-9, EU-19 and EU-20) stack exhausts (SV-4, SV-5, SV-14 and SV-15) once per shift.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain the following:
  - (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle operation.
  - (2) Documentation of the dates vents are redirected.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain records of the results of the inspections required under Condition D.1.9 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

#### **SECTION D.2**

#### **FACILITY OPERATION CONDITIONS**

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#### Facility Description [326 IAC 2-8-4(10)]:

- (c) Six (6) forge press cells, identified as EU-1 through EU-6, controlled by five (5) hydrostatic precipitators (rotoclones), each cell is equipped with one (1) load tub lift and bowl loader, with a total of two (2) meter boxes, and twenty-one (21) induction coils, with three (3) forge press cells (EU-1 through EU-3) exhausting to stack SV-1 and three (3) forge press cells (EU-4 through EU-6) exhausting to stack SV-2, maximum capacity: 4.05 tons of steel billets per hour, total.
- (d) One (1) forge press cell, identified as EU-13, constructed in 1998, controlled by a hydrostatic precipitator (rotoclone), equipped with one (1) load tub lift, one (1) meter box, one (1) bowl loader, and four (4) induction coils, exhausting to stack SV-9, maximum capacity: 1.04 tons of steel billets per hour.
- (e) One (1) 3000-ton forge press cell (Serial No. 21601), identified as EU-14, constructed in 1999, controlled by a hydrostatic precipitator (rotoclone) and including five (5) induction coils with a maximum temperature up to 2250EF, two (2) inverters, one (1) billet load system, one (1) transform conveyor and one (1) cool down conveyor, exhausting through stack SV-9, maximum capacity: 1.04 tons of steel billets per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from each of the eight (8) forge press cells (EU-1 through EU-6, EU-13 and EU-14) shall be limited to 0.03 grain per dry standard cubic foot, equivalent to 0.425 pounds per hour from the two (2) forge press cells identified as EU-13 and EU-14, when operating at a flow rate of 1,654 actual cubic feet per minute, 0.478 pounds per hour from the three (3) forge press cells, identified as EU-1 through EU-3, when operating at a flow rate of 1,859 actual cubic feet per minute, and 0.414 pounds per hour from the three (3) forge press cells identified as EU-4 through EU-6, when operating at a flow rate of 1,610 actual cubic feet per minute.

#### D.2.2 Particulate Matter (PM and PM<sub>10</sub>) [326 IAC 2-8-4] [326 IAC 2-2] [40 CFR 52.21]

- (a) In order to comply with 326 IAC 2-8, FESOP, the PM<sub>10</sub> emissions from the total of the eight (8) forge press cells shall not exceed 0.005 pounds per hour. This will result in PM<sub>10</sub> emissions of less than 0.021 tons per year from the eight (8) forge press cells. Together with Condition D.1.2(a), this condition shall limit the potential to emit PM<sub>10</sub> to less than one hundred (100) tons per year from the total of all facilities at this source. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (b) The potential to emit PM from the total of the eight (8) forge press cells shall not exceed 0.613 pounds per hour, which is equivalent to potential to emit PM before controls. This will result in PM emissions of 2.68 tons per year from the total of the eight (8) forge press cells. Together with Condition D.1.2(b), this condition shall limit the potential to emit PM to less than 250 tons per year from the total of all facilities at this source. Therefore, the requirements of 326 IAC 2-2, PSD, do not apply.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

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#### **Compliance Determination Requirements**

#### D.2.4 Particulate Matter (PM and PM<sub>10</sub>)

- (a) Pursuant to FESOP 141-5555-00057, issued on December 11, 1996, and in order to comply with Conditions D.2.1 and D.2.2, the hydrostatic precipitators (rotoclones) for PM and PM<sub>10</sub> control shall be in operation at all times when the six (6) forge press cells (EU-1 through EU-6) are in operation.
- (b) Pursuant to FESOP 141-5555-00057, issued on December 11, 1996, and in order to comply with Conditions D.2.1 and D.2.2, the hydrostatic precipitator (rotoclone) for PM and  $PM_{10}$  control shall be in operation at all times when the one (1) forge press cell (EU-13) is in operation.
- (c) Pursuant to FESOP 141-5555-00057, issued on December 11, 1996, and in order to comply with Conditions D.2.1 and D.2.2, the hydrostatic precipitator (rotoclone) for PM and PM<sub>10</sub> control shall be in operation at all times when the one (1) forge press cell (EU-14) is in operation.

#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.2.5 Visible Emissions Notations

- (a) Visible emissions notations of the forge press cells (EU-1 EU-6, EU-13 and EU-14) stack exhausts (SV-1, SV-2 and SV-9) shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C Compliance Response Plan Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

#### Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.2.6 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the forge press cells (EU-1 EU-6, EU-13 and EU-14) stack exhausts (SV-1, SV-2 and SV-9) once per shift.
- (b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

#### Permit Reviewer: CAP/MES Revised by: MES

#### **SECTION D.3**

#### **FACILITY OPERATION CONDITIONS**

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#### Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour (total capacity is approximately 28.0 million British thermal units per hour). There are no boilers at this source.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including two (2) maintenance parts washers with capacities less than 80 gallons each and using only non-halogenated solvents. [326 IAC 8-3]
- The following equipment related to manufacturing activities not resulting in the emission of HAPs: (c) brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1]
- (d) Natural draft cooling towers not regulated under a NESHAP.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Paved roads and parking lots with public access.
- (g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. Specifically including the following equipment, with dry processes exhausting to bag/barrel filters and wet processes having self-contained coolant reservoirs, with equipment in the die set up area exhausting to stack SV-7 and equipment in the tool room exhausting to stack SV-8: [326 IAC 6-1]
  - Engin 20 X 54 lathe (1)
  - (2) Engin 16 X 102 lathe
  - Two (2) 12" wheel grinders (3)
  - Jet abrasive cut off saw (4)
  - Vertical band saw (5)
  - Norton surface grinder (6)
  - Vertical belt polisher (7)
  - (8) Two (2) Taft Peirce surface grinders
  - (9) Cincinnati tool grinder
  - (10)ID/OD grinder
  - (11)Making tool grinder
  - US Electric double end grinder (12)
  - (13)Two (2) double end tool grinders
  - (14)Powermatic belt/disc grinder
  - (15)Abrasive wheel cut off saw
  - (16)10" double end tool grinder
  - (17)4 Ft. radial drill press
  - (18)Engin 10 X 30 Lathe
  - Bridgeport mill vertical 9 X 42 mill (19)
  - (20)**Engin lathe**
  - (21)Enterprise horizontal mill
  - (22)Giddings 10TF CNC lathe

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- (23) Giddings 15TF CNC
- (24) Marvel horizontal saw(25)Madison grinder
- (26) OKK mill
- (27) Bridgeport vertical mill
- (28) Four (4) drill presses
- (29) Arbor press
- (30) Johansson drill press
- (31) Clausing 15" lathe
- (32) Clausing band saw
- (33) Kondia power mill
- (34) Monarch 18" CNC lathe
- (35) Cinn 273A grinder
- (36) Heem 18" vertical saw
- (37) Dewalt 12" radial saw
- (38) Wadtkin 12" table saw
- (39) Empire sand blast cabinet
- (40) 3012U band saw
- (41) 16" Boring mill
- (42) Mazak CNC milling machine
- (43) Okuma CNC Lathe LB35II
- (44) Okuma CNC Lath L1420
- (45) Mitsubishi DWC90HA wire EDM
- (46) Dake movable bed arbor machine
- (h) Welders for maintenance have manganese compounds in rod. Small amount of spray cans are used to mark containers for maintenance (Rustoleum) which contains toluene and xylene. [326 IAC 6-1]
- (i) Oil recovery system.
- (j) Two (2) electric Tool room heat treat cabinets
- (k) Water evaporator
- (I) One (1) plastic blast system, identified as EU-10, constructed in 1994, controlled by a baghouse and Hepa filter, and exhausting to stack SV-6.[326 IAC 6-1], and
- (m) Three (3) Nishijimax NHC100 CNC billet cutoff saws.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.3.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the:

- (a) equipment exhausting through Stack SV-7,
- (b) equipment exhausting through Stack SV-8, and
- (c) three (3) Nishijimax NHC100 CNC billet cutoff saws,

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each, shall be limited to 0.03 grain per dry standard cubic foot.

#### D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without remote solvent reservoirs, in St. Joseph County, shall ensure that the following requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility without remote solvent reservoirs, in St. Joseph County, shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.

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- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### **Compliance Determination Requirements**

#### D.3.3 Particulate Matter (PM and PM<sub>10</sub>)

In order to comply with Condition D.3.1, the control devices for PM and PM<sub>10</sub> control shall be in operation at all times when the insignificant grinding and machining and plastic blast system are in operation.

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### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant

Source Address: 2930 Foundation Drive, South Bend, Indiana 46628 Mailing Address: 2930 Foundation Drive, South Bend, Indiana 46628

FESOP No.: F 141-13952-00057

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.
Please check what document is being certified:
9 Annual Compliance Certification Letter
9 Test Result (specify)
9 Report (specify)
9 Notification (specify)
9 Affidavit (specify)
9 Other (specify)
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

COMPLIANCE BRANCH 100 North Senate Avenue P.O. Box 6015 Indianapolis, Indiana 46206-6015 Phone: 317-233-5674 Fax: 317-233-5967

### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) EMERGENCY OCCURRENCE REPORT

Source Name: Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant

Source Address: 2930 Foundation Drive, South Bend, Indiana 46628 Mailing Address: 2930 Foundation Drive, South Bend, Indiana 46628

FESOP No.: F 141-13952-00057

#### This form consists of 2 pages

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${f 9}$ This is an emergency as defined in 326 IAC 2-7-1(1
--

CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and

CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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f any of the following are not applicable, mark N/A Page 2 of
Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>X</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:
Form Completed by:
Title / Position:
Date:
Phone:

A certification is not required for this report.

Response Steps Taken:

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

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### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant 2930 Foundation Drive, South Bend, Indiana 46628 Source Address: Mailing Address: 2930 Foundation Drive, South Bend, Indiana 46628 FESOP No.: F 141-13952-00057 Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_ Page 1 of 2 This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period". 9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. 9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD Permit Requirement (specify permit condition #) **Date of Deviation: Duration of Deviation: Number of Deviations: Probable Cause of Deviation:** Response Steps Taken: **Permit Requirement** (specify permit condition #) **Date of Deviation: Duration of Deviation: Number of Deviations: Probable Cause of Deviation:** 

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Permit Requirement (specify permit condition #)						
Date of Deviation	n:		<b>Duration of Deviation:</b>			
Number of Devia	lumber of Deviations:					
Probable Cause	of Devia	ation:				
Response Steps	Taken:					
Permit Requirem	ent (spe	ecify permit condition #)				
Date of Deviation	n:		Duration of Deviation:			
Number of Devia	tions:					
Probable Cause	of Devia	ation:				
Response Steps	Taken:					
Permit Requirem	ent (spe	ecify permit condition #)				
Date of Deviation	n:		Duration of Deviation:			
Number of Devia	tions:					
Probable Cause	of Devia	ation:				
Response Steps	Taken:					
	9	No deviation occurred in	this quarter.			
9 Deviation/s occurred in this quarter. Deviation has been reported on:						
Form Completed By:						
Title/Position:						
	Date:					
	Phone:					

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Name: Eaton Corporation, Heavy-Duty Transmission

**Division, Forge Plant** 

Source Location: 2930 Foundation Drive, South Bend, Indiana 46628

County: St. Joseph SIC Code: 3462

Operation Permit No.: F 141-13952-00057
Significant Permit Revision No.: SPR 141-17787-00057
Permit Reviewer: CarrieAnn Paukowits

On August 14, 2003, the Office of Air Quality (OAQ) had a notice published in the South Bend Tribune, South Bend, Indiana, stating that Eaton Corporation, Heavy-Duty Transmission had applied for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP) to construct and operate one (1) table blast system and one (1) through blast system with baghouses as controls. The notice also stated that OAQ proposed to issue a Significant Permit Revision to a FESOP for this operation and provided information on how the public could review the proposed Significant Permit Revision to a FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Significant Permit Revision to a FESOP should be issued as proposed.

On August 18, 2003, James F. Seaver, Plant Engineer, Eaton Corp., submitted comments on the proposed Significant Permit Revision to a FESOP. The comments are as follows (The permit language, if changed, has deleted language as strikeouts and new language **bolded.**):

#### Comment 1:

Form GSD-10(a) (the permit application questionnaire), Section A.3 insignificant activities and Section D.3 of the facility description from the draft permit, lists natural gas-fired combustion sources with heat input equal to 10,000,000 British thermal units per hour. We did submit an inventory list of all our natural fired gas equipment with a potential to produce 28,000,000 British thermal units per hour. We do not know if this approach or data was in line with the information that your Team was looking for in this permit. You will note that this number is a potential rather than an everyday use of our gas energy.

#### Response 1:

Since the capacity of each natural gas-fired combustion unit is less than ten (10) million British thermal units per hour, they are considered insignificant activities. The full capacity of the source was considered when developing emission limitations. Therefore, there are no necessary changes to the permit in response to your comment. However, for completeness, item (a) of Section A.3 and the facility description box in Section D.3 is revised as follows:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour (total capacity is approximately 28.0 million British thermal units per hour). There are no boilers at this source.

Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant South Bend, Indiana

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#### Comment 2:

In Section D.1.5 the permit states testing must be demonstrated within 180 days from the initial start up of the blast equipment introduction to this facility. This represents a problem when we look at a calendar and a time line and the safety requirements of our facility. We will install the table blast equipment within 30 days upon receipt of the final permit. This would make it operational sometime in September. If we add 180 days to that time line it would put us in the February time frame. We have a standing rib metal roof at our facility. The stack will be 40 feet in the air. With the winter snow and ice on the roof, and all the test equipment that is needed is accessed from and on the roof. The winter months are not a good time to address this need. Would it be possible to ask for an additional 90-day window to be added to the permit requirement? This would address the safety concerns of our Teammates and our contractor.

#### Response 2:

Due to the possibility of unsafe conditions on the roof during the winter months, Condition D.1.5(b) has been revised as follows:

(b) Within one hundred and eighty (180) two hundred and seventy (270) days after initial startup, in order to demonstrate compliance with Conditions D.1.1(b), D.1.1(c), and D.1.2, the Permittee shall perform PM and  $PM_{10}$  testing for the one (1) table blast system (EU-19) and the one (1) through blast system (EU-20) utilizing methods as approved by the Commissioner.  $PM_{10}$  includes filterable and condensible  $PM_{10}$ . Testing shall be conducted in accordance with Section C- Performance Testing.

Upon further review, the OAQ has decided to make the following changes to the FESOP. The permit language is changed to read as follows (deleted language appears as strikeouts, new language is **bolded**):

#### Change 1:

The area code for the Northern Regional Office has been corrected in Condition B.14(b)(4), as follows:

Regional Office Telephone No.: **574** <del>219</del>-245-4870 Regional Office Facsimile No.: **574** <del>219</del>-245-4877

#### Change 2:

Condition D.1.10 is revised as follows:

#### D.1.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with

Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant South Bend, Indiana

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Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

# Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

#### **Source Background and Description**

Source Name: Eaton Corporation, Heavy-Duty Transmission

**Division, Forge Plant** 

Source Location: 2930 Foundation Drive, South Bend, Indiana 46628

County: St. Joseph

SIC Code: 3462

Operation Permit No.: F 141-13952-00057
Operation Permit Issuance Date: February 19, 2002
Significant Permit Revision No.: SPR 141-17787-00057
Permit Reviewer: CarrieAnn Paukowits

The Office of Air Quality (OAQ) has reviewed a significant permit revision application from Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant relating to the construction and operation of the following emission units and pollution control devices:

- (a) One (1) table blast system, identified as EU-19, equipped with a baghouse and exhausting through stack SV-14, maximum process weight rate: 2,000 pounds per hour.
- (b) One (1) through blast system, identified as EU-20, equipped with a baghouse and exhausting through stack SV-15, maximum process weight rate: 6,650 pounds per hour.

Though the name on the permit (Eaton Corporation) is the correct and legal name of the corporation, "Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant" is the legal name of the source. Therefore, the source name will be changed on the permit to Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant.

#### **History**

On May 28, 2003, Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant submitted an application to the OAQ requesting to construct and operate additional shot blasters at their existing plant. Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant was issued a Federally Enforceable State Operating Permit (FESOP) on February 19, 2002. A first Administrative Amendment (141-17369) was issued on June 19, 2003.

#### **Enforcement Issue**

There are no enforcement actions pending.

#### **Stack Summary**

Stack ID	Operation	Operation Height (feet) Diameter (feet)		Flow Rate (acfm)	Temperature (EF)	
SV-14	Table Blast System	40.0	1.33	2,200	ambient	
SV-15	Through Blast System	40.0	1.33	5,000	ambient	

Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant

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Significant Permit Revision No.: 141-17787-00057

Permit Reviewer: CAP/MES

#### Recommendation

The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 28, 2003. Additional information was received on July 28 and 30, 2003.

#### **Emission Calculations**

See page 1 of 1 of Appendix A of this document for detailed emissions calculations.

#### **Unrestricted Potential To Emit of Revision**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls for this revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	322
PM <sub>10</sub>	32.2
SO <sub>2</sub>	0.00
VOC	0.00
СО	0.00
NO <sub>X</sub>	0.00

HAPs	Potential To Emit (tons/year)
Manganese	4.19
Chromium	0.805
Nickel	0.644
TOTAL	5.64

Permit Reviewer: CAP/MES

#### **Justification for Revision**

The FESOP is being revised through a FESOP Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(f)(1)(E)(i) since the potential to emit  $PM_{10}$  from this revision is greater than twenty five (25) tons per year.

#### **County Attainment Status**

The source is located in St. Joseph County.

Pollutant	Status
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	maintenance
СО	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) St. Joseph County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
  Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

#### **Source Status**

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	199
PM <sub>10</sub>	99.8
SO <sub>2</sub>	1.00
VOC	5.00

Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant

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Significant Permit Revision No.: 141-17787-00057

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Pollutant	Emissions (tons/year)
СО	10.0
NO <sub>X</sub>	15.0
Individual HAP	1.00
Total HAPs	1.00

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the limitations in the permit and are stated in the TSD to AA 141-17369, issued on June 19, 2003.

#### Potential to Emit of Revision After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this FESOP revision.

	Potential to Emit (tons/year)						
Process/facility	PM	PM <sub>10</sub>	SO <sub>2</sub>	voc	СО	NO <sub>x</sub>	HAPs
Proposed Revision (included with the emission limitations for the existing blasters, EU-8 and EU-9)	192	95.9	-	1	-	-	5.64
PSD Threshold Level	250	250	250	250	250	250	-

- (a) This revision to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) The proposed table blaster and proposed through blaster are incorporated into the PM and  $PM_{10}$  limitations existing in the FESOP. Therefore, the overall potential to emit PM or  $PM_{10}$  will not increase due to this revision.

#### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) applicable to this source.

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#### State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration)

The unrestricted potentials to emit PM and  $PM_{10}$  are greater than 250 tons per year from this modification. The potential to emit  $PM_{10}$  from the entire source is limited to less than 100 tons per year in order to comply with 326 IAC 2-8-4, FESOP. The potential to emit PM is limited as follows:

- (a) Pursuant to Condition D.1.2(b) of the FESOP issued on February 19, 2002, the potential to emit PM from the total of the two (2) existing shot blasting machines (EU-8 and EU-9) shall not exceed 43.8 pounds per hour. The applicant has indicated that the 43.8 pound per hour limit is acceptable for the total of the four (4) blast machines. The total potential to emit PM from the one (1) table blast system (EU-19) and the one (1) through blast system (EU-20) is 0.735 pounds per hour after control by the baghouse. According to the TSD for F 141-13952-00057, issued on February 19, 2002, the potential to emit PM from the two (2) existing blasters (EU-8 and EU-9) is 1.19 pounds per hour after control, which is supported by the latest compliance tests. Therefore, the four (4) blasters (EU-8, EU-9, EU-19 and EU-20) will comply with this limitation. The baghouses shall be in operation at all times the blasters are in operation, in order to comply with this limit.
- (b) Pursuant to Condition D.2.2(b) of the FESOP, the PM emissions from the total of the eight (8) forge press cells shall not exceed 0.613 pounds per hour, equivalent to the unrestricted potential to emit.

These limitations result in PM emissions of less than 192 tons per year from the total of the four (4) blasting units, 2.68 tons per year from the total of the eight (8) forge press cells and less than 199 tons per year, which is less than 250 tons per year, from the total of all facilities at this source, including insignificant activities. Thus, the source is still a minor source pursuant to 326 IAC 2-2, PSD, and the modification is a minor modification to an existing minor source pursuant to 326 IAC 2-2, PSD. Therefore, the requirements of 326 IAC 2-2, PSD, still do not apply.

#### 326 IAC 2-8-4 (FESOP)

The potential to emit  $PM_{10}$  is limited as follows:

- (a) Pursuant to Condition D.1.2(a) of the FESOP issued on February 19, 2002, the PM $_{10}$  emissions from the total of the two (2) existing shot blasting machines (EU-8 and EU-9) shall not exceed 21.89 pounds per hour. The applicant has indicated that the 21.89 pound per hour limit is acceptable for the total of the four (4) blast machines. The total potential to emit PM $_{10}$  from the one (1) table blast system (EU-19) and the one (1) through blast system (EU-20) is 7.35 pounds per hour before control and 0.074 pounds per hour after control by the baghouse. According to the TSD for F 141-13952-00057, issued on February 19, 2002, the potential to emit PM $_{10}$  from the two (2) existing blasters (EU-8 and EU-9) is 1.19 pounds per hour after control, which is supported by the latest compliance tests. Therefore, the four (4) blasters will comply with this limit. The baghouses shall be in operation at all times the blasters are in operation, in order to comply with this limit.
- (b) Pursuant to Condition D.2.2(a) of the FESOP, the PM<sub>10</sub> emissions from the total of the eight (8) forge press cells shall not exceed 0.005 pounds per hour.

These limitations will result in  $PM_{10}$  emissions of less than 95.9 tons per year from the four (4) blasting machines, less than 0.021 tons per year from the eight (8) forge press cells and less than 99.8 tons per year, which is less than 100 tons per year, from the total of all facilities at this source, including insignificant activities. Therefore, the source will remain a FESOP source pursuant to 326

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IAC 2-8, FESOP, and the requirements of 326 IAC 2-7, Part 70, still do not apply.

326 IAC 6-1 (County Specific Particulate Matter Limitations)

This source, located in St. Joseph County, is not specifically listed in sections 8.1 through 18 of 326 IAC 6-1, but has the potential to emit one hundred (100) tons or more of particulate matter per year. Therefore, the requirements of 326 IAC 6-1 are applicable.

- (a) Pursuant to 326 IAC 6-1-2(a), particulate matter emissions from the one (1) proposed table blast system, identified as EU-19, shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)), equivalent to 0.566 pounds per hour when operating at a flow rate of 2,200 dry standard cubic feet per minute. The potential to emit particulate from the one (1) proposed table blast system is 0.170 pound per hour after control by the baghouse. Therefore, the one (1) proposed table blast system will comply with this rule. The baghouse shall be in operation at all times the one (1) table blast system is in operation, in order to comply with this limit.
- (b) Pursuant to 326 IAC 6-1-2(a), particulate matter emissions from the one (1) proposed through blast system, identified as EU-20, shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)), equivalent to 1.29 pounds per hour when operating at a flow rate of 5,000 dry standard cubic feet per minute. The potential to emit particulate from the one (1) proposed through blast system is 0.565 pound per hour after control by the baghouse. Therefore, the one (1) proposed through blast system will comply with this rule. The baghouse shall be in operation at all times the one (1) through blast system is in operation, in order to comply with this limit.

#### **Compliance Requirements**

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The one (1) proposed table blast system (EU-19) and the one (1) proposed through blast system have applicable compliance monitoring conditions as specified below:

(a) Visible emission notations of the one (1) table blast system (EU-19) and the one (1) through blast system (EU-20) stacks (SV-14 and SV-15) exhaust shall be performed once per shift

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during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation,

Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the one (1) table blast system (EU-19) and the one (1) through blast system (EU-20), at least once per shift when the blasting is in operation when venting to the atmosphere. When or any one reading, the pressure drop across the baghouse is outside the normal range of 0.50 and 1.00 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan -Failure to Take Response. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C Compliance Response Plan -Preparation, Implementation. Records. and Reports. shall be considered a violation of this permit.
- (c) An inspection shall be performed each calendar quarter of all bags controlling the one (1) table blast system (EU-19) and the one (1) through blast system (EU-20) when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (d) In the event that bag failure has been observed:
  - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B-Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
  - (2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B Emergency Provisions).

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(e) Additional inspections and preventive measures shall be performed as prescribed in the

These monitoring conditions are necessary because the baghouses for the one (1) table blast system (EU-19) and the one (1) through blast system (EU-20) must operate properly to ensure compliance with 326 IAC 6-1 (County Specific Particulate Matter Emission Limitations) and 326 IAC 2-8 (FESOP), and to ensure that this source a minor source pursuant to 326 IAC 2-2 (PSD).

#### **Testing Requirements**

An initial compliance test is required for the PM and  $PM_{10}$  emissions from the one (1) table blast system (EU-19) and the one (1) through blast system (EU-20) to document compliance with 326 IAC 6-1 (County Specific Particulate Matter Emission Limitations) and 326 IAC 2-8 (FESOP), as well as the limitation which ensures that this source is a minor source pursuant to 326 IAC 2-2, PSD.

#### **Proposed Changes**

The permit language is changed to read as follows (deleted language appears as strikeouts, new language appears in bold):

The source name has been revised on the cover page, all headers and all forms, as follows:

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Preventive Maintenance Plan.

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) shot blast machine, identified as EU-8, constructed in 1980, equipped with a baghouse and exhausting through stack SV-4, capacity: 28 cubic feet, with a maximum process weight rate of 3.324 tons per hour.
- (b) One (1) shot blast machine, identified as EU-9, constructed in 1997, equipped with a baghouse and exhausting through stack SV-5, capacity: 34 cubic feet, with a maximum process weight rate of 3.324 tons per hour.
- (c) Six (6) forge press cells, identified as EU-1 through EU-6, controlled by five (5) hydrostatic precipitators (rotoclones), each cell is equipped with one (1) load tub lift and bowl loader, with a total of two (2) meter boxes, and twenty-one (21) induction coils, with three (3) forge press cells (EU-1 through EU-3) exhausting to stack SV-1 and three (3) forge press cells (EU-4 through EU-6) exhausting to stack SV-2, maximum capacity: 4.05 tons of steel billets per hour, total.
- (d) One (1) forge press cell, identified as EU-13, constructed in 1998, controlled by a hydrostatic precipitator (rotoclone), equipped with one (1) load tub lift, one (1) meter box, one (1) bowl loader, and four (4) induction coils, exhausting to stack SV-9, maximum capacity: 1.04 tons of steel billets per hour.
- (e) One (1) 3,000-ton forge press cell (Serial No. 21601), identified as EU-14, constructed in 1999, controlled by a hydrostatic precipitator (rotoclone) and including five (5) induction coils with a maximum temperature up to 2,250EF, two (2) inverters, one (1) billet load system, one (1) transform conveyor and one (1) cool down conveyor, exhausting through stack SV-9, maximum capacity: 1.04 tons of steel billets per hour.

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(f) One (1) table blast system, identified as EU-19, equipped with a baghouse and exhausting through stack SV-14, maximum process weight rate: 2,000 pounds per hour.

(g) One (1) through blast system, identified as EU-20, equipped with a baghouse and exhausting through stack SV-15, maximum process weight rate: 6,650 pounds per hour.

#### **SECTION D.1**

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) shot blast machine, identified as EU-8, constructed in 1980, equipped with a baghouse and exhausting through stack SV-4, capacity: 28 cubic feet, with a maximum process weight rate of 3.324 tons per hour.
- (b) One (1) shot blast machine, identified as EU-9, constructed in 1997, equipped with a baghouse and exhausting through stack SV-5, capacity: 34 cubic feet, with a maximum process weight rate of 3.324 tons per hour.
- (f) One (1) table blast system, identified as EU-19, equipped with a baghouse and exhausting through stack SV-14, maximum process weight rate: 2,000 pounds per hour.
- (g) One (1) through blast system, identified as EU-20, equipped with a baghouse and exhausting through stack SV-15, maximum process weight rate: 6,650 pounds per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### D.1.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

- Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from each of the two (2) shot blast machines (EU-8 and EU-9) shall be limited to 0.03 grain per dry standard cubic foot, equivalent to 0.996 pounds per hour from the one (1) shot blast machine identified as EU-8, when operating at a flow rate of 3,907 actual cubic feet per minute, and 1.53 pounds per hour from the one (1) shot blast machine identified as EU-9, when operating at a flow rate of 6,136 actual cubic feet per minute.
- (b) Pursuant to 326 IAC 6-1-2(a) (County Specific Particulate Matter Limitations), particulate matter (PM) emissions from the one (1) table blast system (EU-19) shall be limited to seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)), equivalent to 0.566 pounds per hour when operating at a flow rate of 2,200 dry standard cubic feet per minute.
- (c) Pursuant to 326 IAC 6-1-2(a) (County Specific Particulate Matter Limitations), particulate matter (PM) emissions from the one (1) through blast system (EU-20) shall be limited to seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)), equivalent to 1.29 pounds per hour when operating at a flow rate of 5,000 dry standard cubic feet per minute.

#### D.1.2 Particulate Matter (PM and PM<sub>10</sub>) [326 IAC 2-8-4] [326 IAC 2-2] [40 CFR 52.21]

(a) Pursuant to FESOP 141-5555-00057, issued on December 11, 1996, and in order to comply with 326 IAC 2-8, FESOP, the PM<sub>10</sub> emissions from the total of the two (2) four (4) shot

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blasting machines (EU-8, and EU-9, **EU-19** and **EU-20**) shall not exceed 21.89 pounds per hour. This will result in  $PM_{10}$  emissions of less than 95.9 tons per year from the two (2) four (4) shot blasting machines. Together with Condition D.2.2(a), this condition shall limit the potential to emit  $PM_{10}$  to less than one hundred (100) tons per year from the total of all facilities at this source. Therefore, the requirements of 326 IAC 2-7 do not apply.

(b) The potential to emit PM from the total of the two (2) four (4) shot blasting machines (EU-8, and EU-9, EU-19 and EU-20) shall not exceed 43.8 pounds per hour. This will result in PM emissions of less than 192 tons per year from the total of the two (2) four (4) shot blasting units. Together with Condition D.2.2(b), this condition shall limit the potential to emit PM to less than 250 tons per year from the total of all facilities at this source. Therefore, the requirements of 326 IAC 2-2, PSD, do not apply.

#### D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

- (a) During the period between July 29, 2002 and January 25, 2003, in order to demonstrate compliance with Conditions D.1.1 and D.1.2 the Permittee shall perform PM and PM<sub>10</sub> testing of the two (2) shot blast machines (EU-8 and EU-9) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM<sub>10</sub> includes filterable and condensible PM<sub>10</sub>. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) Within one hundred and eighty (180) days after initial startup, in order to demonstrate compliance with Conditions D.1.1(b), D.1.1(c), and D.1.2, the Permittee shall perform PM and PM<sub>10</sub> testing for the one (1) table blast system (EU-19) and the one (1) through blast system (EU-20) utilizing methods as approved by the Commissioner. PM<sub>10</sub> includes filterable and condensible PM<sub>10</sub>. Testing shall be conducted in accordance with Section C- Performance Testing.

#### D.1.6 Particulate Matter (PM and PM<sub>10</sub>)

- (a) Pursuant to FESOP 141-5555-00057, issued on December 11, 1996, and in order to comply with Conditions D.1.1 and D.1.2, the baghouse for PM and  $PM_{10}$  control shall be in operation at all times when the shot blast machine (EU-8) is in operation.
- (b) Pursuant to FESOP 141-5555-00057, issued on December 11, 1996, and in order to comply with Conditions D.1.1 and D.1.2, the baghouse for PM and PM<sub>10</sub> control shall be in operation at all times when the shot blast machine (EU-9) is in operation.
- (c) In order to comply with Conditions D.1.1(a) and D.1.2, the baghouse for particulate control shall be in operation at all times when the one (1) table blast system (EU-19) is in operation.
- (d) In order to comply with Conditions D.1.1(b) and D.1.2, the baghouse for particulate control shall be in operation at all times when the one (1) through blast system (EU-20) is in operation.

#### D.1.7 Visible Emissions Notations

- (a) Visible emission notations of the shot blasting (EU-8, and EU-9, EU-19 and EU-20) stack exhausts (SV-4, and SV-5, SV-14 and SV-15) shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not

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counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C Compliance Response Plan Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

#### D.1.8 Parametric Monitoring

- (a) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the two (2) shot blast machines (EU-8 and EU-9), at least once per shift when the shot blast machines are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C Compliance Response Plan Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the one (1) table blast system (EU-19) and the one (1) through blast system (EU-20), at least once per shift when the blasting is in operation when venting to the atmosphere. When or any one reading, the pressure drop across the baghouse is outside the normal range of 0.50 and 1.00 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan -Failure to Take Response. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instruments used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.1.9 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the shot blast machines (EU-8, and EU-9, EU-19 and EU-20) when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

#### D.1.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan. response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### D.1.11 Record Keeping Requirements

- To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the shot blast machines (EU-8, and EU-9, EU-19 and EU-20) stack exhausts (SV-4, and SV-5, SV-14 and SV-15) once per shift.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain the following:
  - (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle operation.
  - (2) Documentation of the dates vents are redirected.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain records of the results of the inspections required under Condition D.1.9 and the dates the vents are redirected.
- All records shall be maintained in accordance with Section C General Record Keeping (c) Requirements, of this permit.

#### Conclusion

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 141-17787-00057.

### Appendix A: Emission Calculations cleaning and finishing

Company Name: Eaton Corporation, Heavy-Duty Transmission Division, Forge Plant

Address City IN Zip: 2930 Foundation Drive, South Bend, Indiana 46628

Significant FESOP Revision: 141-17787 Plt ID: 141-00057

Reviewer: CarrieAnn Paukowits/ MES

Date: May 28, 2003

Table Blast: EU-19, SV-14

Process:	Maximum Throughput Rate	Pollutant	Ef	Ebc	Ebc	Type of control	Control Efficiency	Eac	Eac
	(tons steel/hr)		(lb/ton produced)	(lbs/hr)	(ton/yr)		(%)	(lbs/hr)	(ton/yr)
Castings Cleaning	1.000	PM	17.00	17.0	74.5	baghouse	99.00%	0.170	0.745
and Finishing		PM-10	1.70	1.70	7.45		99.00%	0.017	0.074

HAP	Maximum Weight	Emission Rate	Emission Rate	
	% in Shot	before Controls (tons/yr)	after Controls (tons/yr)	
Manganese	1.30%	0.968	0.010	
Chromium	0.25%	0.186	0.002	
Nickel	0.20%	0.149	0.001	
	Totals:	1.30	0.013	

Through Blast: EU-20, SV-15

Till ough Blust. LO-20, OV-10									
Process:	Maximum Throughput Rate	Pollutant	Ef	Ebc	Ebc	Type of control	Control Efficiency	Eac	Eac
	(tons steel/hr)		(lb/ton produced)	(lbs/hr)	(ton/yr)		(%)	(lbs/hr)	(ton/yr)
Castings Cleaning	3.325	PM	17.00	56.5	248	baghouse	99.00%	0.565	2.48
and Finishing		PM-10	1.70	5.65	24.8		99.00%	0.057	0.248

HAP Maximum Weight		Emission Rate	Emission Rate		
	% in Shot	before Controls (tons/yr)	after Controls (tons/yr)		
Manganese	1.30%	3.22	0.032		
Chromium	0.25%	0.619	0.006		
Nickel	0.20%	0.495	0.005		
	Totals:	4.33	0.043		

Totals	Potential to Emit before Controls	Potential to Emit before Controls	Potential to Emit after Controls	Potential to Emit after Controls
	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
PM	73.5	322	0.735	3.22
PM-10	7.35	32.2	0.074	0.322
Manganese		4.19		0.042
Chromium		0.805		0.008
Nickel		0.644		0.006
Total HAPs		5.64		0.056

#### Methodology

PM and PM-10 Emission Factors from FIRE 6.23, SCC # 3-04-007-11 and AP-42, Chapter 12.13.

Emissions before controls (Ebc) (lbs/hr) = Maximum Throughput Rate (tons steel/hr) x Emission factor (Ef) (lb/ton)

Emissions before controls (Ebc) (tons/yr) = Maximum Throughput Rate (tons steel/hr) x Emission factor (Ef) (lb/ton) x 8,760 hrs/yr / 2,000 lbs/ton

Emissions after controls (Eac) (lbs/hr) = Emissions before controls (Ebc) (lbs/hr) x (1- Control Efficiency)

Emissions after controls (Eac) (tons/yr) = Emissions before controls (Ebc) (tons/yr) x (1- Control Efficiency)

HAP Emission Rate before Controls (tons/yr) = PM Emissions before controls (Ébc) (tons/yr) x Maximum Weight % HAP in shot based on MSDS

HAP Emission Rate after Controls (tons/yr) = PM Emissions after controls (Eac) (tons/yr) x Maximum Weight % HAP in shot based on MSDS